

Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Plasti-Kote Co., Inc. has requested to restrict the emissions of any individual hazardous air pollutant (HAP) to 9.5 tons per rolling, 12-month period, the emissions of total combined hazardous air pollutants (HAPs) to 24.5 tons per rolling, 12-month period, and the emissions of volatile organic compounds (VOC) to 249.4 tons per rolling, 12-month period. The company proposed these emission limits to avoid being classified as a major source for PSD and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, and Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPP). Plasti-Kote Co., Inc. has accepted these emission limits as facility-wide caps on emissions from the following emissions units: B002, B003, K001, K002, K003, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, R003, R004, R005, R006, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T022, T023, T024, Z002, Z005, Z018, Z019, Z020, Z021, Z022, Z023, Z024, Z025, Z026, Z027, Z028, Z029, Z030, Z031, Z044, Z045, Z046, Z047, Z048, Z049, Z050, Z051, Z052, Z053, Z054, Z055, Z056, Z057, Z058, Z059, Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, and Z072.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

. Maximum Allowable	Maximum Allowable	Maximum Allowable
. Cumulative Emissions	Cumulative Emissions	Cumulative Emissions of
Month(s) of VOC of Each Individual HAP	Total Combined HAPs	

1	62.4 tons	2.4 ton	6.1 tons
1-2	79.4 tons	3.0 tons	7.8 tons
1-3	96.4 tons	3.7 tons	9.4 tons
1-4	113.4 tons	4.3 tons	11.1 tons
1-5	130.4 tons	5.0 tons	12.8 tons
1-6	147.4 tons	5.6 tons	14.5 tons
1-7	164.4 tons	6.3 tons	16.1 tons
1-8	181.4 tons	6.9 tons	17.8 tons
1-9	198.4 tons	7.6 tons	19.5 tons
1-10	215.4 tons	8.2 tons	21.2 tons
1-11	232.4 tons	8.9 tons	22.8 tons
1-12	249.4 tons	9.5 tons	24.5 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC, individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

3. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, P002, P003, P004, P005, P006, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, R003, R004, R005, and R006:

- a. For emissions units K001, K002, K003, R003, R004, R005, and R006:
 - i. the name and identification number of each coating, as applied;
 - ii. the VOC content of each coating in pounds of VOC per gallon of coating, as applied;
 - iii. the individual HAP* content for each HAP of each coating, in weight percent (ratio of each individual HAP to VOC), as applied;
 - iv. the combined HAPs content of each coating, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from (iii));
 - v. the number of gallons of each coating employed;
 - vi. the name and identification of each cleanup material employed;

- vii. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;
 - viii. the individual HAP content for each HAP of each cleanup material, in weight percent (ratio of each individual HAP to VOC), as applied;
 - ix. the combined HAPs content of each cleanup material, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from (viii));
 - x. the number of gallons of each cleanup material employed;
 - xi. the total VOC from all coatings employed, in tons per month (the sum of (ii) times (v) for each coating, then divide by 2000 lbs/ton);
 - xii. the total VOC from all cleanup materials employed, in tons per month (the sum of (vii) times (x) for each cleanup material, then divide by 2000 lbs/ton);
 - xiii. the total VOC from all coatings and cleanup materials employed, in tons per month (i.e., (xi) plus (xii));
 - xiv. the total individual HAP emissions for each HAP from all coatings employed, in tons per month (for each HAP the sum of (iii) divided by 100 times (xi) for each coating);
- a.
 - xv. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (for each HAP the sum of (viii) divided by 100 times (xii) for each cleanup material);
 - xvi. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (i.e., (xiv) plus (xv));
 - xvii. the total combined HAPs emissions from all coatings employed, in tons per month (the sum of (iv) divided by 100 times (xi) for each coating);
 - xviii. the total combined HAPs emissions from all cleanup materials employed, in tons per month (the sum of (ix) times (xii) for each cleanup material); and
 - xix. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (i.e., (xvii) plus (xviii)).

Note: The permittee may use a spreadsheet (i.e., the spreadsheets provided in the June 12, 2000 letter from the facility) to maintain the above-mentioned records and to do the emission calculations.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
- b. For emissions units P002, P003, P004, P005, and P006:
 - i. the total number of aerosol paint cans filled using emissions units P002, P003, and P004;
 - ii. the total number of aerosol paint cans filled using emissions units P005 and P006; and
 - iii. the VOC emission rate from gassing, in tons per month (i.e., the sum of the product of (i) times 0.0048 pounds of VOC per can* plus the product of (ii) times 0.002168 pounds of VOC per can*, divided by 2000 lbs/ton).

* Emission factor is based on manufacturing and/or stack testing data supplied by the permittee in correspondence dated April 25, 2001.

Note: The VOC, individual HAP, and combined HAPs emissions from the filling of paint into the can for emissions unit P002, P003, P004, P005, and P006 are listed under A.3.h below. The VOC, individual HAP, and combined HAPs emissions from the mixing prior to filling the can with paint is determined under A.3.d below.
- c. For emissions unit P007:
 - i. the company identification for each solvent and cleanup material employed;
 - ii. the number of gallons of each cleanup material employed;
 - iii. the VOC content of each cleanup material, in pounds per gallon;
 - iv. the VOC emission rate for all cleanup materials, in pounds per month (i.e., the sum of (ii) times (iii) for each cleanup material);
 - v. the total amount of solvent employed, in pounds;
 - vi. the VOC emission rate for the solvent, in pounds per month (i.e., (v) times 0.01 (AP-42, Section 6.4.1, dated 5/83)); and
 - vii. the total VOC emission rate for the solvent and all cleanup materials, in tons per month (i.e., (iv) plus (vi), then divided by 2000 lbs/ton).

- d. For emissions units P009, P010, P011, P012, P013, P014, P015, P016, P017, P022, P023, P024, and the mixing prior to filling the aerosol paint cans:
- the total throughput of paint, in pounds per month;
 - the VOC emission rate from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18);
 - the individual HAP emission rate for each HAP from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18); and
 - the combined HAPs emission rate from filling and surface evaporation, in tons per month (i.e., the sum of the individual HAP emission rates from (iii)).
- e. For emissions units P018, P019, and P020:
- the total throughput of paint, in pounds per month;
 - the VOC emission rate from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18);
 - the individual HAP emission rate for each HAP from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18); and
 - the combined HAPs emission rate from filling and surface evaporation, in tons per month (i.e., the sum of the individual HAP emission rates from (iii)).
- f. For emissions unit P021:
- the number of cans degassed per month; and
 - the VOC emission rate, in tons per month (i.e., multiply (i) times 0.191875 pound of VOC per can degassed*, then divide by 2000 lbs/ton).
- * Emission factor supplied by the permittee in correspondence dated September 15, 2000.
- g. For emissions units P025:
- the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;
 - the individual HAP* content for each HAP of each cleanup material, in weight percent, as applied;
 - the combined HAPs content of each cleanup material, in weight percent, as applied (i.e., sum all the individual HAP contents from (iii));
 - the number of batches;
 - the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions);
 - the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions); and
 - the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions).
- * A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
- h. For emissions units P026:
- the name and identification of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

- iii. the individual HAP* content for each HAP of each cleanup material, in weight percent, as applied;
 - iv. the combined HAPs content of each cleanup material, in weight percent, as applied (i.e., sum all the individual HAP contents from (iii));
 - v. the number of batches;
 - vi. the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions);
 - vii. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions); and
 - viii. the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions).

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- i. the following table is a list of all the insignificant emissions units and the insignificant emissions units' potentials to emit (PTE) for VOC, individual HAP, and combined HAP:

. PTE for PTE for PTE for
Emissions VOC individual combined
Unit ID (tpy) HAP (tpy) HAPs (tpy)

B002	0.0992	0.034	0.034
B003	0.1984	0.068	0.068
PO08	1.16	0.19	0.5
T001	0.262	0.262	0.262
T002	0.1895	0.1895	0.1895
T003	0.074	0.074	0.074
T004	0.0355	0.0	0.0
T006	0.2385	0.0	0.0
T007	0.131	0.0	0.0
T008	0.7735	0.193375	0.193375
T009	0.4015	0.00803	0.00803
T010	0.0895	0.0895	0.0895
T011	0.1335	0.0	0.0
T012	0.1335	0.0	0.0
T013	0.139	0.0	0.0
T022	0.1	0.0	0.0
T023	0.1	0.0	0.0
T024	0.1	0.0	0.0
Z002	0.03	0.0	0.0

- i. 005 1.57 0.0 0.0
 - Z018 0.11 0.10 0.11
 - Z019 0.65 0.20 0.36
 - Z020, Z021, 0.942 0.18 0.43
Z022, Z023,
Z024, and
Z025
 - Z026 0.97 0.90 0.97
 - Z027 and 0.26 0.07 0.15

Z028

Z029, Z030, 0.26 0.08 0.16
and Z031

Z044, Z045, 0.72 0.14 0.34
Z046, Z047,
Z048, Z049,
Z050, Z051,
Z052, Z053,
Z054, Z055,
Z056, and
Z057

Z058 0.78 0.10 0.28

Z059 0.34 0.068 0.085

Z060, Z061, 1.247 0.58 1.21
Z062, Z063,
Z064, Z065,
Z066, Z067,
Z068, Z069,
Z070, Z071,
and Z072

P002, P003, 3.93 0.79 3.144
P004, P005,
and P006*

TOTAL 16.1676 4.316405 8.657405

The potentials to emit for the above-mentioned insignificant emissions units are based on the assumed inherent physical limitations that are listed in Table 1 of the letter dated October 1, 2001 from Plastikote Co., Inc.

One twelfth of the total annual emissions shall be added to the monthly emissions calculations (i.e., 1.3473 tons of VOC per month, 0.3597004 ton of individual HAP per month, and 0.7214504 ton of combined HAPs per month).

- i. The emissions from the filling of aerosol paint cans only.

The permittee shall not store any material which contains any of the HAPs listed in section 112(b) of the Clean Air Act in emissions units T004, T006, T007, T011, T012, T013, T022, T023, and T024. The permittee shall maintain documentation to prove that each material stored does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was stored in emissions units T004, T006, T007, T011, T012, T013, T022, T023, and/or T024 which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is stored.

The permittee shall not employ any material which contains any of the HAPs listed in section 112(b) of the Clean Air Act in emissions units Z002 and Z005. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed in emissions units Z002 and/or Z005 which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.

- j. For the entire facility:

i. the total VOC emission rate for the entire facility, in tons per month (i.e., (A.3.a.xiii) plus (A.3.b.iii) plus (A.3.c.vii) plus (A.3.d.ii) plus (A.3.e.ii) plus (A.3.f.ii) plus (A.3.g.vi) plus (A.3.h.vi) plus 1.3473);

ii. the total individual HAP emission rate for each HAP for the entire facility, in tons per month (i.e., (A.3.a.xvi) plus (A.3.d.iii) plus (A.3.e.iii) plus (A.3.g.vii) plus (A.3.h.vii) plus 0.3597004);

iii. the total combined HAPs emission rate for all emissions units, in tons per month (i.e., (A.3.a.xix) plus (A.3.d.iv) plus (A.3.e.iv) plus (A.3.g.viii) plus (A.3.h.viii) plus 0.7214504);

iv. during the first 12 calendar months of operations following the issuance of this permit, the cumulative emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month; and

v. beginning after the first 12 calendar months of operations following the issuance of this permit, the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation reports shall be submitted in accordance with the

requirements specified in Part I - General Term and Condition A.1.c.

5. The permittee shall submit annual reports that specify the following information:
 - a. for the entire facility, the rolling, 12-month summations of the monthly emissions of VOC, individual HAP, and total combined HAPs for each month during the calendar year (January through December); and
 - b. for the entire facility, the cumulative emissions of VOC, each individual HAP, and total combined HAPs for each month for the first 12 calendar months of operation following the issuance of this permit.

The annual reports shall be submitted by April 15 of each year, and shall cover the records for the previous calendar year (January through December).
6. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 9.5 tons of individual HAP per rolling, 12-month period
 - 24.5 tons of total combined HAPs per rolling, 12-month period
 - 249.4 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Monthly record keeping in accordance with sections A.3, A.3.a, A.3.b, A.3.c, A.3.d, A.3.e, A.3.f, A.3.g, A.3.h, and A.3.j of these terms and conditions.
7. The material employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) shall not contain any of the HAPs listed in section 112(b) of the Clean Air Act. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.
8. The permittee shall not employ any materials (i.e., solvent, cleanup material) that contain any of the HAPs listed in section 112(b) of the Clean Air Act in emissions unit P007. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed in emissions unit P007 which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.
9. The permittee shall only store acetone in emissions unit T005.

The permittee shall submit deviation (excursion) reports that identify any day during which any material other than acetone was stored in emissions unit T005. These reports shall be sent to the Akron RAQMD within 30 days after any such material is stored.

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
 - B002 - boiler #1;
 - B003 - boiler #2;
 - P008 - bulk paint filling line of 1 oz. and 2 oz. jars of touch-up paint;
 - T001 - 5,000-gallon fixed roof storage tank;
 - T002 - 10,000-gallon fixed roof storage tank;
 - T003 - 5,000-gallon fixed roof storage tank;
 - T004 - 5,000-gallon fixed roof storage tank;
 - T005 - 15,000-gallon fixed roof storage tank;
 - T006 - 5,000-gallon fixed roof storage tank;
 - T007 - 10,000-gallon fixed roof storage tank;
 - T008 - 10,000-gallon fixed roof storage tank;
 - T009 - 10,000-gallon fixed roof storage tank;
 - T010 - 3,000-gallon fixed roof storage tank;
 - T011 - 3,000-gallon fixed roof storage tank;
 - T012 - 4,500-gallon fixed roof storage tank;
 - T013 - 10,000-gallon fixed roof storage tank;
 - T014 - 10,000-gallon fixed roof storage tank;
 - T015 - 1,850-gallon fixed roof storage tank;
 - T016 - 3,500-gallon fixed roof storage tank;
 - T022 - 10,000-gallon vertical cylindrical storage tank;
 - T023 - 10,000-gallon vertical cylindrical storage tank;
 - T024 - 10,000-gallon vertical cylindrical storage tank;
 - Z002 - rework gasser;
 - Z005 - automatic drum washer for specialty products mixing room;
 - Z018 - ball mill;
 - Z019 - SW mill;

Z020 - paste concentrate storage tank #1;
 Z021 - paste concentrate storage tank #2;
 Z022 - paste concentrate storage tank #3;
 Z023 - paste concentrate storage tank #4;
 Z024 - paste concentrate storage tank #5;
 Z025 - paste concentrate storage tank #6;
 Z026 - tank L-1 multi-run;
 Z027 - mill pre-mix station #1;
 Z028 - mill pre-mix station #2;
 Z029 - sand mill #1;
 Z030 - sand mill #2;
 Z031 - sand mill #3;
 Z044 - car color paint mixing station #1;
 Z045 - car color paint mixing station #2;
 Z046 - car color paint mixing station #3;
 Z047 - car color paint mixing station #4;
 Z048 - car color paint mixing station #5;
 Z049 - car color paint mixing station #6;
 Z050 - car color paint mixing station #7;
 Z051 - car color paint mixing station #8;
 Z052 - car color paint mixing station #9;
 Z053 - car color paint mixing station #10;
 Z054 - car color paint mixing station #11;
 Z055 - car color paint mixing station #12;
 Z056 - car color paint mixing station #13;
 Z057 - car color paint mixing station #14;
 Z058 - QC spray booth;
 Z059 - lid cleaning;
 Z060 - 2,500-gallon fixed roof storage tank (T022*);
 Z061 - 2,500-gallon fixed roof storage tank (T023*);
 Z062 - 6,000-gallon fixed roof storage tank (T024*);
 Z063 - 5,600-gallon fixed roof storage tank (T025*);
 Z064 - 5,000-gallon fixed roof storage tank (T026*);
 Z065 - 6,000-gallon fixed roof storage tank (T027*);
 Z066 - 6,000-gallon fixed roof storage tank (T028*);
 Z067 - 6,000-gallon fixed roof storage tank (T029*);
 Z068 - 6,000-gallon fixed roof storage tank (T030*);
 Z069 - 3,500-gallon fixed roof storage tank (T031*);
 Z070 - 2,800-gallon fixed roof storage tank (T032*);
 Z071 - 1,200-gallon fixed roof storage tank (T033*); and
 Z072 - 5,500-gallon fixed roof storage tank (T034*).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

*The permittee incorrectly designated the Ohio EPA IDs for the insignificant storage tanks (T022 through T034). Ohio EPA files do not have any records for these storage tanks. Ohio EPA files show that there are three 10,000-gallon storage tanks designated as T022, T023, T024. For these reasons, the Ohio EPA IDs were changed to Z0XX.

2. For each emissions unit listed in the Title V application as insignificant because of Ohio Revised Code (ORC) 3704.036, that was installed after January 1, 1974 and has not applied for and obtained a permit to install, the permittee shall submit a complete permit to install application within 30 days after the final issuance of the Title V permit.

[Go to Part III for Emissions Unit K001](#)

[Go to Part III for Emissions Unit K002](#)

[Go to Part III for Emissions Unit K003](#)

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Facility ID: 1652050060 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
surface coating line for plastic caps - paint spray booth #2	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;

- d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

- 1. Compliance with the emission limitations and operational restrictions in section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 8.0 lbs/hr of organic compounds (OC)
 - 40 lbs/day of OC
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	117.0 lbs/day of volatile organic compounds (VOC) for coatings
		252.0 lbs/day of acetone for coatings

50.0 tpy of acetone for coatings and cleanup materials

2.41 tpy of particulate emissions

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).

OAC rule 3745-31-05(D)
(PTI 16-01940)

The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively.

6.1 tons of VOC per rolling, 12-month period for coatings

See A.II.1 below.

OAC rule 3745-17-07(A)

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11

0.551 lb/hr of particulate emissions

OAC rule 3745-21-07(G)(2)

See A.I.2.a below.

2. Additional Terms and Conditions

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
- b. Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

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II. Operational Restrictions

- 1. The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the coating usage levels specified in the following table:

. Maximum Allowable	Maximum Allowable
. Cumulative Car Color	Cumulative Red Spot
Month(s) Coating Usage	Primer Coating Usage

1	428.6 gallons	507.1 gallons
1-2	857.1 gallons	1014.3 gallons
1-3	1285.7 gallons	1521.4 gallons
1-4	1714.3 gallons	2028.6 gallons
1-5	2142.9 gallons	2535.7 gallons
1-6	2571.4 gallons	3042.9 gallons
1-7	3000.0 gallons	3550.0 gallons
1-8	3000.0 gallons	3550.0 gallons
1-9	3000.0 gallons	3550.0 gallons
1-10	3000.0 gallons	3550.0 gallons
1-11	3000.0 gallons	3550.0 gallons
1-12	3000.0 gallons	3550.0 gallons

- 2. The permittee shall only employ cleanup materials that do not contain any VOC, as defined in OAC rule 3745-21-01(B)(6).
- 3. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;

- b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information for this emissions unit:
 - a. the name and identification of each cleanup material employed; and
 - b. documentation as to whether or not each cleanup material contains any VOC.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, divided by 2000 lbs/ton); and
 - b. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.
5. The permittee shall maintain monthly records of the following information:
 - a. the car color coating usage and the red spot primer coating usage for each month;
 - b. the VOC content of each car color coating and each red spot primer coating, in pounds per gallon; and
 - c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative coating usage for each calendar month.
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon;
 - c. the acetone content of each coating, in pounds per gallon;
 - d. the volume, in gallons, of each coating employed;
 - e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and
 - f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).
7. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the acetone content of each cleanup material, in pounds per gallon;
 - c. the volume, in gallons, of each cleanup material employed;
 - d. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions

in section A.III.6.f above for each month, divided by 2000 lbs/ton);

- e. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton); and
 - f. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (e)).
8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.
 9. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 6.1 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the car color coating usage exceeded 3000 gallons as a rolling, 12-month average, the actual car color coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels; and
 - b. an identification of each month during which the red spot primer coating usage exceeded 3550 gallons as a rolling, 12-month average, the actual red spot primer coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing VOC (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.
8. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.
9. The permittee shall also submit annual reports that specify the total acetone and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be

determined in accordance with the following methods:

a. Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

d. Emission Limitation:

6.1 tons of VOC per rolling, 12-month period for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

e. Emission Limitation:

117.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = [\text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE) \times 8760] / 2000$

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

- g. Emission Limitation:
 252.0 lbs/day of acetone for coatings
 Applicable Compliance Method:
 Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data shall be used to determine the acetone content for each coating.

- h. Emission Limitation:
 50.0 tpy of acetone for coatings and cleanup materials
 Applicable Compliance Method:
 Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.6 and A.III.7. Formulation data shall be used to determine the acetone content for each coating and cleanup material.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3	none	See B.VI.1 below.

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit was installed prior to the Ohio EPA's Air Toxic Policy. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1652050060 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
surface coating line for plastic caps - paint spray booth #4	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a

photochemically reactive material.

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

1. Compliance with the emission limitations and operational restrictions in section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
 - 8.0 lbs/hr of organic compounds (OC)
 - 40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint filling line #1	none	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint filling line #2	none	See A.I.2.a below.
2. Additional Terms and Conditions		
a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.		

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II. Operational Restrictions

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P004 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint filling line #3	none	See A.I.2.a below.
2. Additional Terms and Conditions		
a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P004 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint filling line #4	none	See A.I.2.a below.
2. Additional Terms and Conditions		
a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.		

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II. Operational Restrictions

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P006 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint filling line #5	none	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

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II. **Operational Restrictions**

1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P006 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P007 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Fleckstone production area	OAC rule 3745-31-05(A)(3) (PTI 16-1973)	0.5 lb/hr of particulate emissions
		2.2 tpy of particulate emissions
		3.53 lbs/hr of organic compounds (OC)
		17.5 tpy of OC, including cleanup material emissions
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2) as specified in section A.I.2.
	OAC rule 3745-17-07	See A.I.2.a below.

OAC rule 3745-17-11

See A.I.2.b below.

OAC rule 3745-21-07(G)(2)

See A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

- a. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- b. The particulate emission limitation based on this applicable rule is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- c. A person shall not discharge more than 40 pounds of organic materials into the atmosphere in any one day from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.
- d. The hourly OC emission limitation based on this applicable rule is less stringent than the hourly OC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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1. None

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1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each liquid organic raw material and cleanup material employed;
 - b. documentation as to whether or not each liquid organic raw material and cleanup material is a photochemically reactive material; and
 - c. when a new liquid organic raw material or cleanup material is going to be employed in this emissions unit, the permittee shall determine and document, prior to employing the new liquid organic raw material or cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in this emissions unit, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each liquid organic raw material and cleanup material employed;
 - b. documentation of whether or not each liquid organic raw material and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each photochemically reactive cleanup material employed;
 - d. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day (i.e., the sum of (c) times (d) for each photochemically reactive cleanup material);
 - f. the total amount of solvent employed, in pounds per day;
 - g. the organic compound emission rate for the solvent, in pounds per day (i.e., (f) times 0.01 (AP-42, Section 6.4.1, dated 5/83)); and
 - h. the total organic compound emission rate for the solvent and all photochemically reactive cleanup materials, in pounds per day (i.e., (e) plus (g)).
3. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each solvent and cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content of each cleanup material, in pounds per gallon;
 - d. the organic compound emission rate for all cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each cleanup material);
 - e. the total amount of solvent employed, in pounds;
 - f. the organic compound emission rate for the solvent, in pounds per month (i.e., (e) times 0.01 (AP-42, Section 6.4.1, dated 5/83));

- g. the total organic compound emission rate for the solvent and all cleanup materials, in tons per month (i.e., (d) plus (f), then divided by 2000 lbs/ton);
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for the solvent and all cleanup materials, (i.e., [(d) plus (f)]/(h)).
4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
 5. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information for the days during which a photochemically reactive material (coating or cleanup material) was employed: an identification of each day during which the organic compound emissions from the raw materials and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly organic compound emissions exceeded 3.53 lbs/hr, and the actual average hourly organic compound emissions for each such day.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
5. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.1.1 and A.1.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 20% opacity as a 6-minute average
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:
 - 0.5 lb/hr of particulate emissions
 - Applicable Compliance Method:
 - Compliance shall be demonstrated by multiplying the particulate emission factor of 20 pounds of particulate emissions per ton of pigment (AP-42, Table 6.4-1, dated 5/83) by the maximum hourly tons of pigment employed. Then multiply the resulting uncontrolled emission rate by an overall control factor of 81% (1-.81).
 - c. Emission Limitation:
 - 2.2 tpy of particulate emissions
 - Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 20 pounds of particulate emissions per ton of pigment (AP-42, Table 6.4-1, dated 5/83) by the actual yearly tons of pigment employed. Then multiply the resulting uncontrolled emission rate by an overall control factor of 81% (1-.81), and then divide by 2000 lbs/ton.

d. Emission Limitation:

40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the organic compound contents of the photochemically reactive cleanup materials.

e. Emission Limitation:

3.53 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

f. Emission Limitation:

17.5 tpy of OC, including emissions from cleanup material

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. Formulation data shall be used to determine the organic compound contents of the cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P007 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Fleckstone production area	none	See B.VI.1 below.
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P009 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #1	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ a cover to reduce solvent evaporation losses.

- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIPP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC
 - Applicable Compliance Method:
 - Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P009 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #1		

- Additional Terms and Conditions**
 - None

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II. **Operational Restrictions**

- None

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III. **Monitoring and/or Record Keeping Requirements**

- The permit to install for this emissions unit (P009) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an

evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P010 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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paint mixing station #2	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. 8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P010 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #2		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (P010) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76
 Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #3	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC
 Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P011 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #3		
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P011) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76
 Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P012 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #7	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC
- Applicable Compliance Method:
- Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P012 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #7		
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P012) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 15.64

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240

MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76
 Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P013 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #4	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. **Additional Terms and Conditions**
 - a. The permittee shall employ a cover to reduce solvent evaporation losses.
 - b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
 - c. Based on the "worst-case" emission scenario and using EIPP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and

Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitations:

- 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P013 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #4		
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P013) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in

stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P014 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #9	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions

calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC
 - Applicable Compliance Method:
 - Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P014 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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- paint mixing station #9
2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental

Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P015 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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paint mixing station #12

OAC rule 3745-31-05(A)(3)
(PTI 16-1758)

7.3 tpy of organic compounds (OC)

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

See A.I.2.a below.

OAC rule 3745-21-07(G)(2) 8.0 lbs/hr of OC
40 lbs/day of OC

See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EILP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P015 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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paint mixing station #12

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P015) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410

Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P016 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #13	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. 8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. **Additional Terms and Conditions**
 - a. The permittee shall employ a cover to reduce solvent evaporation losses.
 - b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
 - c. Based on the "worst-case" emission scenario and using EILP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC
 - 7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P016 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #13		

2. **Additional Terms and Conditions**
 1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P016) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188
 Maximum Hourly Emission Rate (lbs/hr): 15.64
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
 MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
 Maximum Hourly Emission Rate (lbs/hr): 0.81
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
 MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76
 Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P017 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #14	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ a cover to reduce solvent evaporation losses.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EILP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC

7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: P017 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #14		
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (P017) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1188

Maximum Hourly Emission Rate (lbs/hr): 15.64

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240

MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 0.81

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4

MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 1.97
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
 MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
 Maximum Hourly Emission Rate (lbs/hr): 0.73
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
 MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
 MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
 Maximum Hourly Emission Rate (lbs/hr): 0.36
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
 MAGLC (ug/m3): 23404.76

Pollutant: methyl methacrylate

TLV (mg/m3): 410
 Maximum Hourly Emission Rate (lbs/hr): 0.29
 Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
 MAGLC (ug/m3): 9761.9

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3) (PTI 16-01990)	2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tpy of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.
	OAC rule 3745-31-05(D) (PTI 16-01990)	0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation
	OAC rule 3745-21-07(G)(2)	See A.I.2.d and A.II.1 below. 40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

- a. Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).
- b. The permittee shall employ a cover during each mixing operation to reduce volatilization losses.
- c. The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.

- d. The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020, combined, are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

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II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production

1 1,875 tons
 1-2 3,750 tons
 1-3 5,625 tons
 1-4 7,500 tons
 1-5 9,375 tons
 1-6 11,250 tons
 1-7 13,125 tons
 1-8 15,000 tons
 1-9 16,875 tons
 1-10 18,750 tons
 1-11 20,625 tons
 1-12 22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
- the total amount of paint produced*, in tons;
 - the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and
 - the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).
- * The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.
2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:
- the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and
 - beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.
- Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.
3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production

levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

2.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.
 - b. Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.
 - c. Emission Limitation:

192.6 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.
 - d. Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.
 - e. Emission Limitation:

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3,

8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation:

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P018 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1000-gallon paint mixing tank	none	See B.III below.
2. Additional Terms and Conditions		

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P018) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in

stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P019 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3) (PTI 16-01990)	2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tpy of OC for P018, P019, and P020, combined
	OAC rule 3745-31-05(D) (PTI 16-01990)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below. 0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

OAC rule 3745-21-07(G)(2)

See A.I.2.d and A.II.1 below.
40.0 lbs/day of VOC

The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See A.I.2.a below.

2. Additional Terms and Conditions

- a. Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).
- b. The permittee shall employ a cover during each mixing operation to reduce volatilization losses.
- c. The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.
- d. The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020 combined are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

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II. Operational Restrictions

- 1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production

- 1 1,875 tons
- 1-2 3,750 tons
- 1-3 5,625 tons
- 1-4 7,500 tons
- 1-5 9,375 tons
- 1-6 11,250 tons
- 1-7 13,125 tons
- 1-8 15,000 tons
- 1-9 16,875 tons
- 1-10 18,750 tons
- 1-11 20,625 tons
- 1-12 22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the total amount of paint produced*, in tons;
 - b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and
 - c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).

* The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

- 2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

- a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month;
and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production levels.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

2.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A
 - b. Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.
 - c. Emission Limitation:

192.6 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

d. Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

e. Emission Limitation:

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation:

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Emissions Unit ID: P019 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1000-gallon paint mixing tank	none	See B.III below.
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P019) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.
Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee

determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P020 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3)	2.56 lbs/hr of volatile organic compounds (VOC)

(PTI 16-01990)

191.3 lbs/day of organic compounds (OC)

27.6 tpy of OC for P018, P019, and P020, combined

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.

OAC rule 3745-31-05(D)
(PTI 16-01990)

0.30 pound of individual hazardous air pollutant (HAP) per ton of paint produced

0.67 pound of combined HAPs per ton of paint produced

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

See A.II.1 below.

OAC rule 3745-21-07(G)(2)

40.0 lbs/day of VOC

The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).
- b. The permittee shall employ a cover during each mixing operation to reduce volatilization losses.
- c. The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.

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II. **Operational Restrictions**

- 1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month Maximum Allowable Cumulative Production

- 1 1,875 tons
- 1-2 3,750 tons
- 1-3 5,625 tons
- 1-4 7,500 tons
- 1-5 9,375 tons
- 1-6 11,250 tons
- 1-7 13,125 tons
- 1-8 15,000 tons
- 1-9 16,875 tons
- 1-10 18,750 tons
- 1-11 20,625 tons
- 1-12 22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record the following information for each day for this emissions unit:

- a. the total amount of paint produced*, in tons;
 - b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.45 pounds of OC per ton of paint produced*); and
 - c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.51 pound of VOC per ton of paint produced*).
- * The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.
2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:
 - a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and
 - b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.
 3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production levels.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 191.3 pounds per day, and the actual OC emissions for each such day.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

2.56 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.51 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.
 - b. Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

c. Emission Limitation:

191.3 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

d. Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

e. Emission Limitation:

0.30 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

f. Emission Limitation:

0.67 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

g. Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

h. Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P020 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.	Additional Terms and Conditions		
1.	2000-gallon paint mixing tank	none	See B.III below.
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (P020) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone
 TLV (mg/m3): 1187
 Maximum Hourly Emission Rate (lbs/hr): 23.0*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947
 MAGLC (ug/m3): 28,267.9
 Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590
 Maximum Hourly Emission Rate (lbs/hr): 2.2*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P021 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
degassing booth	none	See A.I.2.a below.

2. Additional Terms and Conditions

- a. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: P021 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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paint mixing station #5	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.
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2. **Additional Terms and Conditions**

- a. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one

- day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
- a. Emission Limitations:
- 8 lbs/hr of OC
40 lbs/day of OC
- Applicable Compliance Method:
- Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Emissions Unit ID: P022 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1.	None	

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P023 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.	Additional Terms and Conditions	
	paint mixing station #6	OAC rule 3745-21-07(G)(2)
		See A.I.2.a and A.I.2.b below.

- a. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EILP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P023 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P024 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mixing station #8	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- a. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.
- b. Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.
- c. Based on the "worst-case" emission scenario and using EIIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8 lbs/hr of OC
 - 40 lbs/day of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: P024 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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- | | | | |
|--|--------------------------------|---------------------------|---------------------------------------|
| | automatic tank washing station | OAC rule 3745-21-07(G)(2) | Measures
See A.I.2.a below. |
|--|--------------------------------|---------------------------|---------------------------------------|
2. **Additional Terms and Conditions**
- a. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information for the automatic tank washing station:
- the MSDS sheets for each cleanup material employed;
 - documentation as to whether or not each cleanup material is a photochemically reactive material; and
 - when a cleanup material is going to be employed in the manual tank washing station, the permittee shall determine and document, prior to employing the new cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the automatic tank washing station, the permittee shall collect and record the following information for each such day for the manual tank washing station:
- the company identification for each cleanup material employed;
 - documentation of whether or not each cleanup material employed is a photochemically reactive material;
 - the number of gallons of each photochemically reactive cleanup material employed;
 - the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;
 - the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day, i.e., the sum of (c) x (d) for all photochemically reactive cleanup materials employed;
 - the total number of hours the emissions unit was in operation; and
 - the average hourly organic compound emission rate for all photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C)(5).]
3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
- an identification of each day during which the average hourly OC emissions from the photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - an identification of each day during which the OC emissions from the photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the record keeping requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the organic compound contents of the photochemically reactive cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Emissions Unit ID: P025 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: P026 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
manual tank washing station	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
2. Additional Terms and Conditions		
a. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information for the manual tank washing station:
 - a. the MSDS sheets for each cleanup material employed;
 - b. documentation as to whether or not each cleanup material is a photochemically reactive material; and
 - c. when a cleanup material is going to be employed in the manual tank washing station, the permittee shall determine and document, prior to employing the new cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the manual tank washing station, the permittee shall collect and record the following information for each such day for the manual tank washing station:
 - a. the company identification for each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each photochemically reactive cleanup material employed;
 - d. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day, i.e., the sum of (c) x (d) for all photochemically reactive cleanup materials employed;
 - f. the total number of hours the emissions unit was in operation; and

- g. the average hourly organic compound emission rate for all photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C)(5).]

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitations:
 - 8.0 lbs/hr of organic compounds (OC)
 - 40 lbs/day of OC
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the OC contents of the photochemically reactive cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Emissions Unit ID: P026 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control</u>
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Measures

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: R003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	256.0 lbs/day of volatile organic compounds (VOC) for coatings 98.4 lbs/day of acetone for coatings 18.0 tpy of acetone for coatings 2.41 tpy of particulate emissions The requirements of this rule also include compliance

OAC rule 3745-31-05(D)
(PTI 16-01940)

with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).

The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the coating and cleanup material usage figures.

The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively.

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

See A.II.1 below.

OAC rule 3745-17-07(A)

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11

0.551 lb/hr of particulate emissions

OAC rule 3745-21-07(G)(2)

See A.I.2.a below.

2. Additional Terms and Conditions

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
- b. There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.
- c. Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

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II. Operational Restrictions

- 1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Fleckstone Coating Usage	Maximum Allowable Clear Coat Coating Usage	Maximum Allowable Cleanup Material Usage
1-2	1315.7 gallons	142.9 gallons	91.4 gallons
1-3	2631.4 gallons	285.7 gallons	182.9 gallons
1-4	3947.1 gallons	428.6 gallons	274.3 gallons
1-5	5262.9 gallons	571.4 gallons	365.7 gallons
1-6	6578.6 gallons	714.3 gallons	457.1 gallons
1-7	7894.3 gallons	857.1 gallons	548.6 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

- 2. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information for this emissions unit:

- a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000 lbs/ton);
 - e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, then divided by 2000 lbs/ton);
 - f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and
 - g. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.
4. The permittee shall maintain monthly records of the following information:
 - a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month;
 - b. the VOC content of each fleckstone coating, each clear coat coating, and each cleanup material, in pounds per gallon; and
 - c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative usage for each calendar month.
5. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon;
 - c. the acetone content of each coating, in pounds per gallon;
 - d. the volume, in gallons, of each coating employed;
 - e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and
 - f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).
6. The permittee shall document whether or not the double frame filter was in service when the emissions unit

was in operation.

7. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 17.31 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the fleckstone coating usage exceeded 9210 gallons as a rolling, 12-month average, the actual fleckstone coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative fleckstone coating usage levels;
 - b. an identification of each month during which the clear coat coating usage exceeded 1000 gallons as a rolling, 12-month average, the actual clear coat coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative clear coat coating usage levels; and
 - c. an identification of each month during which the cleanup material usage exceeded 640 gallons as a rolling, 12-month average, the actual cleanup material usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative cleanup material usage levels.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating, and/or a cleanup material that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 256.0 lbs/day, and the actual daily VOC emissions for each such day.
7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 98.4 lbs/day, and the actual daily acetone emissions for each such day.
8. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 8.0 lbs/hr of organic compounds (OC)
 - 40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.

b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

d. Emission Limitation:

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.5. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

e. Emission Limitation:

256.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = [\text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE) \times 8760] / 2000$$

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation:

98.4 lbs/day of acetone for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data shall be used to determine the acetone content for each coating.

h. Emission Limitation:

18.0 tpy of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the daily allowable emission rate for acetone by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: R003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6 (Modification).		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 45.0*
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624
 MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: R004 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	117.0 lbs/day of volatile organic compounds (VOC) for coatings 252.0 lbs/day of acetone for coatings 50.0 tpy of acetone for coatings and cleanup materials 2.41 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2). The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively. 5.74 tons of VOC per rolling, 12-month period for coatings
	OAC rule 3745-31-05(D) (PTI 16-01940)	
	OAC rule 3745-17-07(A)	See A.II.1 below. Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
- b. There is an increase of 0.94 ton per year in the allowable annual emissions for VOC.
- c. Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

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II. **Operational Restrictions**

1. The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Car Color Coating Usage	Maximum Allowable Red Spot Primer Coating Usage
1	414.3 gallons	442.9 gallons
2	828.6 gallons	885.7 gallons
3	1242.9 gallons	1328.6 gallons
4	1657.1 gallons	1771.4 gallons
5	2071.4 gallons	2214.3 gallons
6	2485.7 gallons	2657.1 gallons
7	2900.0 gallons	3100.0 gallons
8	2900.0 gallons	3100.0 gallons
9	2900.0 gallons	3100.0 gallons
10	2900.0 gallons	3100.0 gallons
11	2900.0 gallons	3100.0 gallons

- 1-12 2900.0 gallons 3100.0 gallons
After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage figures.
2. The permittee shall only employ cleanup materials that do not contain any VOC, as defined in OAC rule 3745-21-01(B)(6).
 3. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.
2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information for this emissions unit:
 - a. the name and identification of each cleanup material employed; and
 - b. documentation as to whether or not each cleanup material contains any VOC.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, divided by 2000 lbs/ton); and
 - b. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.
5. The permittee shall maintain monthly records of the following information:
 - a. the car color coating usage and the red spot primer coating usage for each month;
 - b. the VOC content of each car color coating and each red spot primer coating, in pounds per gallon; and
 - c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative coating usage for each calendar month.
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon;

- c. the acetone content of each coating, in pounds per gallon;
 - d. the volume, in gallons, of each coating employed;
 - e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and
 - f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).
7. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the acetone content of each cleanup material, in pounds per gallon;
 - c. the volume, in gallons, of each cleanup material employed;
 - d. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions in section A.III.6.f above for each month, divided by 2000 lbs/ton);
 - e. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton); and
 - f. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (e)).
 8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.
 9. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 5.74 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the car color coating usage exceeded 2900 gallons as a rolling, 12-month average, the actual car color coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels; and
 - b. an identification of each month during which the red spot primer coating usage exceeded 3100 gallons as a rolling, 12-month average, the actual red spot primer coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing VOC (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.

8. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.
9. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).
 - d. Emission Limitation:

5.74 tons of VOC per rolling, 12-month period for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.
 - e. Emission Limitation:

117.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$$E = [\text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE) \times 8760] / 2000$$

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation:

252.0 lbs/day of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data shall be used to determine the acetone content for each coating.

h. Emission Limitation:

50.0 tpy of acetone for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.6 and A.III.7. Formulation data shall be used to determine the acetone content for each coating and cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

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Facility ID: 1652050060 Emissions Unit ID: R004 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1		
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2. **Additional Terms and Conditions**

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 45.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624

MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1652050060 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: R005 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
surface coating of plastic caps - paint spray booth #5	OAC rule 3745-31-05 (PTI 16-1332)	26.0 lbs/day of total organic compounds (OC), excluding cleanup emissions See A.I.2.a below.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.b below.

2. Additional Terms and Conditions

- a. This emissions unit shall employ a high volume, low pressure (HV LP) spray gun.
- b. A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing photochemically reactive material.

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II. Operational Restrictions

1. The permittee shall use no more than 5.0 gallons of coating per day in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound (OC) content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01 (C)(5).]

2. The permittee shall collect and record the following information for each day for this emissions unit:

- a. the company identification for each coating;
- b. the number of gallons of each coating;
- c. the OC content of each coating, in pounds per gallon;
- d. the total OC emission rate for all coatings, in pounds per day; and
- e. the total number of gallons of all coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
- b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. an identification of each day during which the total OC emissions exceeded 26.0 lbs/day, and the actual OC emissions for each such day; and
- b. an identification of each day during which the coating line employed more than the applicable maximum daily coating usage limit.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

b. Emission Limitation:

26.0 lbs/day of total OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

- c. Operational Restriction:
 - 5.0 gallons of coating per day
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

- d. Emission Limitation:
 - 20% opacity as a 6-minute average
 - Applicable Compliance Method:
 - Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

- e. Emission Limitation
 - 0.551 lb/hr of particulate emissions
 - Applicable Compliance Method:
 - To determine the actual worst case particulate emissions rate, the following equation shall be used:
 - $E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$
 - E = particulate emissions rate (pounds per hour)
 - TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75
 - CE = fractional control efficiency of the control equipment = 0.90
 - If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050060 Emissions Unit ID: R005 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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- 2. **Additional Terms and Conditions**

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050060 Emissions Unit ID: R006 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	256.0 lbs/day of volatile organic compounds (VOC) for coatings 98.4 lbs/day of acetone for coatings 18.0 tpy of acetone for coatings 2.41 tpy of particulate emissions
	OAC rule 3745-31-05(D) (PTI 16-01940)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2). The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a

rolling, 12-month summation of the coating and cleanup material usage figures.

The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively.

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

See A.II.1 below.

OAC rule 3745-17-07(A)

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11

0.551 lb/hr of particulate emissions

OAC rule 3745-21-07(G)(2)

See A.I.2.a below.

2. Additional Terms and Conditions

- a. When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
- b. There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.
- c. Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

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II. Operational Restrictions

- 1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Fleckstone Coating Usage	Maximum Allowable Clear Coat Coating Usage	Maximum Allowable Cleanup Material Usage
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1	1315.7 gallons	142.9 gallons	91.4 gallons
1-2	2631.4 gallons	285.7 gallons	182.9 gallons
1-3	3947.1 gallons	428.6 gallons	274.3 gallons
1-4	5262.9 gallons	571.4 gallons	365.7 gallons
1-5	6578.6 gallons	714.3 gallons	457.1 gallons
1-6	7894.3 gallons	857.1 gallons	548.6 gallons
1-7	9210.0 gallons	1000.0 gallons	640.0 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

- 2. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating and cleanup material employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a

photochemically reactive material.

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in pounds per gallon;
 - d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton);
 - e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, divided by 2000 lbs/ton);
 - f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and
 - g. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.
4. The permittee shall maintain monthly records of the following information:
 - a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month;
 - b. the VOC content of each fleckstone coating, each clear coat coating, and each cleanup material, in pounds per gallon; and
 - c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative usage for each calendar month.
5. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon;
 - c. the acetone content of each coating, in pounds per gallon;
 - d. the volume, in gallons, of each coating employed;
 - e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and
 - f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).
6. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.
7. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and
 - b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 17.31 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each month during which the fleckstone coating usage exceeded 9210 gallons as a rolling, 12-month average, the actual fleckstone coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative fleckstone coating usage levels;
 - b. an identification of each month during which the clear coat coating usage exceeded 1000 gallons as a rolling, 12-month average, the actual clear coat coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative clear coat coating usage levels; and
 - c. an identification of each month during which the cleanup material usage exceeded 640 gallons as a rolling, 12-month average, the actual cleanup material usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative cleanup material usage levels.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating, and/or a cleanup material that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.
5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
6. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 256.0 lbs/day, and the actual daily VOC emissions for each such day.
7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 98.4 lbs/day, and the actual daily acetone emissions for each such day.
8. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.
 - b. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).

d. Emission Limitation:

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.5. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

e. Emission Limitation:

256.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

f. Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

$E = [\text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE) \times 8760] / 2000$

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

g. Emission Limitation:

98.4 lbs/day of acetone for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data shall be used to determine the acetone content for each coating.

h. Emission Limitation:

18.0 tpy of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the daily allowable emission rate for acetone by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050060 Emissions Unit ID: R006 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #7 (Modification).		
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permit to install for this emissions unit (R006) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 45.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624

MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied.

Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None